

Module 13: Emergency Preparedness and Response

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GUIDANCE

Despite an organization's best efforts, accidents and other emergency situations can occur. Effective **emergency preparation and response** can reduce injuries, prevent or minimize environmental impacts, protect employees and neighbors, reduce asset losses, and minimize downtime.

An effective emergency preparedness and response (EP&R) program should include provisions for: (1) assessing the potential for accidents and emergencies; (2) preventing incidents and their associated environmental impacts; (3) responding to incidents (emergency plans and procedures); (4) testing of emergency plans and procedures periodically; and, (5) mitigating impacts associated with accidents and emergencies. Consistent with the focus on continual improvement, it is important to **review** your emergency response performance **after an incident** has occurred. Use this review to determine if more training is needed or if emergency plans and procedures should be revised.

This is another area where you should not have to start from scratch. Several environmental and health and safety **regulatory programs** require emergency plans and/or procedures. Examples of federal requirements related to EP&R that may apply to you are listed below:

Regulatory Driver	Requirement
RCRA	Contingency Plan (LQG), Preparedness and Prevention Plan (LQG and SQG)
CWA	Spill Prevention, Control and Countermeasure Plan (SPCC) and Stormwater Pollution Prevention Plans (SPPP)
OPA	Facility Response, SPCC
Coast Guard	Facility Response Plan
CAAA	Risk Management Plan
EPCRA	Community Right to Know Reporting and Coordination with Local and State Emergency Response Committees

Some facilities are addressing these numerous requirements through **Integrated Contingency Plans** that combine the requirements of numerous regulatory programs into one plan. The federal government has issued guidance for such plan [Federal Register: June 5, 1996 (Volume 61, Number 109)][Page 28641-28664] and electronic versions with corrections and updates are available at <http://www.epa.gov/swercepp/p-tech.htm#one-plan>. While reviewing your EP&R documents for your EMS, you may consider such a streamlining approach.

Because you probably have programs in place for this area, this module focuses on additional items you will need to consider or address for your EMS. Specifically, you will need an **EP&R procedure**. A sample procedure is included as **Tool 13-3, Sample Procedure for EP&R**.

Getting Started

- Two planning components that many organizations overlook are how they **identify the potential for accidents and emergencies** and how they **prevent these occurrences or mitigate their impact**. A cross-functional team (CFT) (with representatives from engineering, maintenance, and environmental health & safety, for example) can identify most potential emergencies by asking a series of “what if” questions related to hazardous materials, activities, and processes employed at the site. In addition to normal operations, the team should consider start-up and shutdown of process equipment, and other abnormal operating conditions.
- When developing procedures ask yourself: How will we ensure that **everyone** (including new employees) know what to do in an emergency? (For example, how would contractors or site visitors know what to do in an emergency situation?)
- Communicate with **local officials** (fire department, hospital, etc.) about potential emergencies at your site and how they can support your response efforts.

Hints

- **Mock drills** can be an excellent way to reinforce training and get feedback on the effectiveness of your plans/procedures.
- **Post copies** of your EP&R plans and procedures (or at least critical contact names and phone numbers) around your facility and especially in areas where high hazards exist. Include phone numbers for your on-site emergency coordinator, local fire department, local police, hospital, rescue squad, and others as appropriate.
- **Revise and improve your plans** as you learn from mock drills, training, or actual emergencies.

Checklist for Emergency Preparedness and Response Plans

Does your plans describe the following:

- | | |
|--|--|
| <input type="checkbox"/> potential emergency situations (such as fires, explosions, spills or releases of hazardous materials, and natural disasters)? | <input type="checkbox"/> locations and types of emergency response equipment? |
| <input type="checkbox"/> hazardous materials used on-site (and their locations)? | <input type="checkbox"/> maintenance of emergency response equipment? |
| <input type="checkbox"/> key organizational responsibilities (including emergency coordinator)? | <input type="checkbox"/> training / testing of personnel, including the on-site emergency response team (if applicable)? |
| <input type="checkbox"/> arrangements with local emergency support providers? | <input type="checkbox"/> testing of alarm / public address systems? |
| <input type="checkbox"/> emergency response procedures, including emergency <u>communication</u> procedures? | <input type="checkbox"/> evacuation routes and exits (map), and assembly points? |



TOOLS

Tool 13-1: Emergency Preparedness and Response Worksheet

Have we reviewed our operations and activities for potential emergency situations? If not, how will this be accomplished? Who should be involved?	
Do our existing emergency plans describe how we will prevent incidents and associated environmental impacts? If not, how will this be accomplished? Who should be involved?	
Have we trained personnel on their roles and responsibilities during emergencies?	
What emergency equipment do we maintain? How do we know that this equipment is adequate for our needs?	
How do contractors and other visitors know what to do in an emergency situation?	
When was our last emergency drill ? Is there a plan / schedule for conducting future drills?	
Have we established a feedback loop so we can learn from our experiences?	
<i>Our next step on emergency preparedness & response is to ...</i>	

Tool 13-2: Emergency Preparedness and Response Requirements Matrix

Potential Emergency Scenario	Potential Environmental Impact	Action Required	Procedures Needed	Training Needed

Tool 13-3: Sample Procedure for Emergency Preparedness and Response

[Note: This procedure assumes that your company has a general EP&R plan in place, into which environmental considerations can be integrated.]

Purpose

As part of its EMS, [Your Facility's Name] strives to ensure that the environmental impacts associated with any emergency situations are prevented or mitigated to the greatest extent possible.

Procedure

1. [Your Facility's Name] has an Emergency Response Committee charged with identifying potential emergency scenarios and developing and ensuring the implementation of appropriate procedures, should an emergency situation develop.
2. With the assistance of the EMS coordinator, the Emergency Response Committee (a) identifies the potential negative significant environmental impacts associated with potential emergency scenarios, (b) incorporates measures to prevent these emergencies or minimize the impacts into EP&R procedures, and (c) ensures that adequate training (including simulations) is provided to appropriate [Your Facility's Name] staff to implement these procedures. Input is obtained from staff in relevant areas that might have suggestions on how to improve EP&R program at our facility.
3. The Emergency Response Committee maintains records of the potential emergency scenarios it is prepared for, the potential environmental impacts associated with each scenario, and the procedures established to minimize these impacts. Also the Emergency Response Committee or designee maintains contact with local emergency response personnel that might assist in the event of an actual emergency. The Human Resources manager keeps records of training received by staff on implementation of emergency response procedures.

Frequency

The Emergency Response Committee meets quarterly to review the status of its work. Contact with local emergency personnel is made at least annually or as necessary based on regulatory requirements or activity changes at the facility that impact the EP&R program.

Records

Records of emergency scenarios, associated potential environmental impacts, and procedures to mitigate these impacts are kept by the Emergency Response Committee. Training records are maintained by the Human Resources Manager.